

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
U.S. ATTORNEY'S OFFICE

UNITED STATES OF AMERICA

2004 MAY -3 A 9:48

v.

ANDRES MARTINEZ  
a/k/a Castro Casimiro  
a/k/a Joel Zequeira  
a/k/a Sacaida, et. al.

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
Criminal No. M-04-1685-CBS

Defendants.

MOTION TO UNSEAL COMPLAINT (2/26/04), SUPPORTING SA JEAN DROUIN  
AFFIDAVIT (2/26/04), AND SUPPORTING AFFIDAVIT OF SA JEAN DROUIN  
(5/1/04) FOR ELEVEN SEARCH WARRANTS

Now comes the United States of America (the "government"), and hereby moves this Honorable Court to unseal the CRIMINAL COMPLAINT in the above-referenced case (dated 2/26/04), the Affidavit of SA JEAN DROUIN AFFIDAVIT in support of the Criminal Complaint (also dated 2/26/04), as well as the AFFIDAVIT OF SA JEAN DROUIN (dated 5/1/04) in support of eleven (11) Search Warrants issued by the Court on May 1, 2004 also in connection with this case.

The government hereby moves for such an Order from the Court as most of the defendants charged in the above entitled Criminal Complaint were arrested on May 1, 2004, pursuant to arrest warrants also issued by the Court on February 26, 2004. As such, it is the interest of justice to unseal the above listed

documents and pleadings currently under seal in this criminal matter.

**Respectfully submitted,**

**MICHAEL J. SULLIVAN**  
United States Attorney

*Robert L. Peabody/oc.*  
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**Dated:** May 3, 2004